all of the customers who ported to a wireless carrier were typical with regard to the volume and duration of calls they would receive and would be the same as our average customer, we projected the number of calls and minutes of use that would need to be queried, transported and transited to wireless carriers over the five year time horizon. This information was then used in estimating both the query expenses and the transport and transiting expenses.

Q. Taking into account your previous response, how was the amount of the query expense over the five years determined?

A. Based upon discussions we have had, it is our current understanding that Cambridge would put triggers into its switch that would result in only calls to ported numbers and long distance calls being required to be queried. The rate per query dip has been obtained from a vendor and the projected demand was developed as described above. Based upon our present understanding, the query expense is relatively minimal.

Q. Please describe the estimates included for transport and transit.

A. Differing from the query expense, the transport and transit costs are more significant. As I indicated earlier, we have used the rates and rate elements that we understand SBC would charge and Cambridge's access rates for the transport and transiting of calls to SBCs Rock Island tandem for delivery to wireless carriers. Like the query costs, the transport and transit costs grow from year to year based upon the estimates of how many customers will have ported their

numbers to wireless carriers in each of the first five years. Both the query and transport and transiting costs, as well as many of the other expenses, would continue on and could potentially grow beyond the five year time horizon included within the exhibit.

Q. If a higher number of customers port to wireless carriers than you have projected in your estimates, what would be in the impact on the estimates you are presenting?

A. If a higher number of customers port resulted in higher call volumes, we will have underestimated both transport and transit costs, as well as the query costs. Cambridge would also have fewer access lines over which to recover any costs, and the costs per subscriber per month would be higher than that reflected on Attachment 1.

Q. If on the other hand Cambridge's belief is correct that there is little or no demand for wireline-to-wireless number portability, what would be the impact?

A. If that is correct, we would have overestimated variable costs, such as transport and transit and query charges. However, the initial start-up investments and expenses would remain as well as certain ongoing expenses. In Cambridge's view, until there is a proven demand, those expenses and investments should not be incurred and they would, in fact, in some ways be even more unfair and burdensome on Cambridge's customers to make them pay for the costs for a service (although the costs would be lower), which they do not desire.

635

636 Q. Please comment on the expense line labeled "regulatory/legal/admin/order
637 processing".

638 A. Based upon our discussions with counsel and the other small companies, we have
639 estimated initial or start-up legal and regulatory costs in the amount of $20,000.
640 The estimate includes estimated fees from consultants and attorneys to negotiate
641 service level agreements with wireless carriers, develop and file LNP tariffs, file
642 company information with NeuStar and in the BIRRDS/LERG data bases,
643 evaluate query and SOA providers and associated agreements, implement
644 regulatory-compliant 911 methods and understand all regulatory requirements
645 associated with intermodal LNP.

646

647 With regard to ongoing administrative expenses, the estimates are based upon
648 information received from NPAC, which assesses a $15.00 charge per request
649 with regard to the porting of numbers. The annual expenses for years 1-5 reflect
650 those charges being assessed against the numbers that are ported within a
651 particular year.

652

653 Q. Please explain the "Employee Education" expense, which you have included on
654 the Attachment.

655 A. Nortel is providing technical training with regard to local number portability.
656 Attachment 3 to my testimony is a copy of the course descriptions that Nortel has
657 indicated are appropriate for technical training with regard to local number

portability. The price for those courses, based upon Nortel's quote, is $8,965 per technical employee trained. Cambridge plans to have two technical employees receive training.

In addition, non-technical employees would need to be trained. We have included training for ten employees at a cost of $300 per employee for any implementation of wireline-to-wireless local number portability. We have also included an ongoing expense for training of $600 per year in years 1-5.

Q. Please discuss the line item entitled "Technical Trouble", which I understand includes technical support to implement the local number portability process and would involve ongoing operational or technical issues related to the provision of local number portability.

A. This is an estimate based upon Cambridge's experience with similar issues and services and our discussions with other small company representatives concerning these types of costs. We have projected total technician time and estimated labor over the entire five-year period and then spread the cost, in part, between start-up costs with the remaining amounts being incurred over each of the five years.

Q. Please provide the basis for the estimated costs related to "customer education".

A. If Cambridge were required to implement wireline-to-wireless number portability, it is the view of Cambridge's management that there would need to be at least two customer education mailing pieces prior to its implementation and that Cambridge would then need to have two ongoing mailings for customer education purposes

each year. Based upon the costs of previous pre-prepared mail pieces and our discussions with other companies, Cambridge is estimating that the costs of a mailing to each customer is 75¢ per mailing, which once again would occur twice each year. In looking at page 1 of Attachment 1, you can see that costs decline per year because of our assumption that we would have fewer access lines as time goes by as a result of certain customers porting their numbers to wireless carriers, as previously discussed.

Q. Describe in detail the type of customer education Cambridge proposes to undertake.

A. Since Cambridge is seeking a suspension of any obligation it may have to provide wireline-to-wireless local number portability, specific customer information pieces have not, as yet, been developed. However, as indicated in my prior answer, the Company intends to send out customer education mailing pieces prior to any time it is to implement wireline-to-wireless local number portability and to continue that education process with follow-up mailings that the Company believes to be necessary. (Response to Staff Data Request 1.19)

Q. Describe the purpose and content of the customer education that Cambridge intends to provide.

A. Once again, since the Company is seeking a suspension of any obligation it may have to provide wireline-to-wireless number portability, the specific content of any customer education pieces has not been developed at this time. The Company

would intend to get informational pieces perhaps developed by larger companies and provided to their customers for use in developing appropriate mailing pieces. The purpose of the customer education would be first and foremost to provide information concerning what wireline-to-wireless number portability is and to provide information to the customer concerning what steps they would need to take if they desired to port their landline number to a wireless telephone. Once again, Cambridge, as a small company, intends to rely upon information developed by larger companies, trade associations, etc. in developing appropriate customer education pieces should they become necessary. (Further Response to Staff Data Request 1.19)

Q. Am I correct that present value calculations were performed as reflected on page 1 of Attachment 1?

A. Yes, that is correct.

Q. Does that complete your discussion of Attachment 1 and Cambridge's estimates of the incremental costs involved to it and the potential amounts that would need to be recovered from Cambridge's customers if required to implement wireline-to-wireless number portability?

A. Yes, it does. I should emphasize that the cost estimates are based upon what is known today and take into account the estimates and assumptions we have made. Other companies may be able to include additional estimated costs, which I have

not included within the Cambridge exhibit, and to that extent, the estimated costs contained in Attachment 1 may well be low.

Q. In regard to the relief that Cambridge is seeking in this proceeding, is Cambridge asking the Commission to enter an Order in this docket permanently suspending any obligation that Cambridge may have to provide wireline-to-wireless local number portability?

A. No, Cambridge is not.

Q. Please describe the relief that Cambridge is requesting.

A. Cambridge is requesting a suspension of any obligation it may have to provide wireline-to-wireless local number portability for a period of 2½ years or 30 months from May 24, 2004 to November 24, 2006. That is the length of suspension that both individual small companies and the Staff have recommended in the five proceedings that were previously heard and which I have referenced in my testimony. After reviewing the testimony and transcripts in those proceedings and discussing the same with Cambridge's management and its advisors, Cambridge believes that the recommendations made by both the companies and the Staff in those proceedings are not only reasonable but are reflective of Cambridge's situation, as well.

Q. Does that conclude your direct testimony?

A. Yes, it does.

Cambridge Telephone Company
LOCAL NUMBER PORTABILITY DATA SUMMARY

	Initial LNP Start-Up Cost	Year 1	Year 2	Year 3	Year 4	Year 5	Total LNP Cost Projections
INVESTMENTS							
LNP Software	$ 11,148	$ -	$ -	$ -	$ -	$ -	**$ 11,148**
OSS	$ -	$ -	$ -	$ -	$ -	$ -	**$ -**
Reserved	$ -	$ -	$ -	$ -	$ -	$ -	**$ -**
Switch Translations	$ 12,000	$ -	$ -	$ -	$ -	$ -	**$ 12,000**
	$ -	$ -	$ -	$ -	$ -	$ -	**$ -**
	$ -	$ -	$ -	$ -	$ -	$ -	**$ -**
-	$ -	$ -	$ -	$ -	$ -	$ -	**$ -**
-	$ -	$ -	$ -	$ -	$ -	$ -	**$ -**
EXPENSES							
Query	$ -	$ 755	$ 881	$ 1,007	$ 1,132	$ 1,258	**$ 5,033**
Transport and Transit	$ -	$ 20,519	$ 23,939	$ 27,359	$ 30,779	$ 34,199	**$ 136,796**
Regulatory/Legal/Admin/Order Proc/Cust Svc	$ 20,000	$ 1,728	$ 288	$ 288	$ 288	$ 288	**$ 22,880**
Employee Education	$ 20,930	$ 600	$ 600	$ 600	$ 600	$ 600	**$ 23,930**
Technical Trouble	$ 8,000	$ 4,000	$ 4,000	$ 4,000	$ 4,000	$ 4,000	**$ 28,000**
Customer Education	$ 3,840	$ 3,610	$ 3,571	$ 3,533	$ 3,494	$ 3,456	**$ 21,504**
Sub-Totals	$ 75,918	$ 31,212	$ 33,279	$ 36,787	$ 40,294	$ 43,801	**$ 261,291**
Present Value Factors	100.0000%	89.8876%	80.7979%	72.6273%	65.2830%	58.6813%	
Present Value Total Cost Projections	**$ 75,918**	**$ 28,056**	**$ 26,889**	**$ 26,717**	**$ 26,305**	**$ 25,703**	**$ 209,588**
Access Lines							**1,301**
Months							**60**
Annual Expense per subscriber per month							**$ 2.69**

LOCAL NUMBER PORTABILITY DATA

FOR DEVELOPMENT OF LNP END USER AND QUERY CHARGES

COMPANY NAME	Cambridge Telephone Company
STUDY AREA NUMBER	0

	AVERAGE MONTHLY LINES	YEAR					
		0 (Current)	1	2	3	4	5
1.	PBX	0	0	0	0	0	0
2.	ISDN-PRI	0	0	0	0	0	0
3.	Other (Sum of Residential, Single Line Business, Multiline Business, Centrex)	1,920	1,805	1,786	1,766	1,747	1,728
3a	TOTAL	1,920	1,805	1,786	1,766	1,747	1,728
3b	Present Value Access Line	1,920	1,622	1,443	1,283	1,141	1,014

	INVESTMENTS	YEAR					
		0 (Current)	1	2	3	4	5
4.	Software Upgrades Total: (Please also itemize below, and provide descriptions in the right-most column)	$23,148	$0	$0	$0	$0	$0
4a.	LNP Software	$11,148					
4b.	OSS	$0					
4c.	Reserved						
4d.	Switch Translations	$12,000					
5.	Hardware & Other (Please list items below)						
5a.	LNP Hardware						
5b.	LNP Transport Hardware						
5c.							
5d.							
	TOTAL	$23,148	$0	$0	$0	$0	$0

	EXPENSES (Maintenance etc.)	YEAR					
6.	Please list items below	0 (Current)	1	2	3	4	5
6a.	Regulatory/Legal/Admin/Order Proc/Cust Svc	$20,000	$1,728	$288	$288	$288	$288
6b.	Employee Education	$20,930	$600	$600	$600	$600	$600
6c.	Technical Trouble	$8,000	$4,000	$4,000	$4,000	$4,000	$4,000
6d.	Customer Education	$3,840	$3,610	$3,571	$3,533	$3,494	$3,456
	TOTAL	$52,770	$9,938	$8,459	$8,421	$8,382	$8,344

Cambridge Telephone Company

Tranport Costs - Tandem 1

Year	SBC / ILEC Transit Rate	Demand Projections	Transit Expense
1	0.016862	1,216,902	$ 20,519
2	0.016862	1,419,719	$ 23,939
3	0.016862	1,622,536	$ 27,359
4	0.016862	1,825,353	$ 30,779
5	0.016862	2,028,170	$ 34,199
Total			$ 136,796

Transport Costs - Tandem 2

Year	GTE / ILEC Transit Rate	Demand Projections	Transit Expense
1			$ -
2			$ -
3			$ -
4			$ -
5			$ -
Total			$ -

Query Dip Charges

Year	Rate	Projected Demand	Present Value Query Charge
1	0.003102	243,380	$ 755
2	0.003102	283,944	$ 881
3	0.003102	324,507	$ 1,007
4	0.003102	365,071	$ 1,132
5	0.003102	405,634	$ 1,258
Total	.		$ 5,033

1 INPUTS

2	**Cambridge Telephone Company**	
3	I-CO Data	
4	PBX Lines	0
5	ISDN-PRI Lines	0
6	Other Access Lines	1,920
7	Equipped Lines	2,787
8	Local MOU- Tandem 1	20,281,704
9	Local MOU- Tandem 2	
10	Number of Employeees	10
11	Number of End Offices Requiring Translations	2
12	RIC	$ 0.001065
13	Tandem Switched Transport	$ 0.010679
14		
15	Tandem 1 Transiting Rates	
16	Tandem Switching	$ 0.004836
17	Tandem Transport	$ 0.000189
18	Tandem Transport Facility	$ 0.000093
19		
20	Tandem 2 Transiting Rates	
21	Tandem Transiting	-
22	Tandem Transport	-
23	Tandem Transport Facility	-
24		
25	Assumptions	
26	Average Holding Time Per Local Call	5.00
27	LNP Query Charge	$ 0.003102
28	Present Value Factor, Year 1	0.89888
29	Present Value Factor, Year 2	0.80798
30	Present Value Factor, Year 3	0.72627
31	Present Value Factor, Year 4	0.65283
32	Present Value Factor, Year 5	0.58681
33	Wireless Penetration, Year 1	6%
34	Wireless Penetration, Year 2	7%
35	Wireless Penetration, Year 3	8%
36	Wireless Penetration, Year 4	9%
37	Wireless Penetration, Year 5	10%
38	Regultatory/Legal Fee Per Hour	$ 200
39	Regulatory/Legal Hours, Year Zero	100
40	Customer Education, Cost Per Mailing	$ 1.00
41	Customer Education, Number of Mailings Per Year	2
42	Employee Education, Cost Per Employee	$ 300.00
43	Employee Education, Number Of Employees Per Year, 1-5	2
44	Cost Per Translation Per Office	$ 3,000
45	Technical Cost Per Hour	$ 50.00
46	Technical Hours, Year Zero	160
47	Technical Hours Per Year, 1-5	80
48	LNP Adminstration Annual Fee	
49	LNP Poret Fee Per Ported Number	$ 15.00
50	Software Cost Per Wired Line	$ 4.00
51	Number of Employees Needing Technical Training	2
52	Cost Per Technical Training Per Employee	8,965

			units		cost per		Total	Comments
4a.	LNP Software		2,787	$	4	$	11,148	The LNP price would be based on the number of equipped lines that in the DMS-10 office. Also the charge increases as the number of equipped lines increase in the DMS-10 area. Either way the price per line is $4.00 per equipmed lines.
4b.	Billing Software - Operation Support Systems		-	$	-	$	-	Can not determine value at this time
4c.								The DMS-10 HSO, SSO or SA office must be at 410.10 generic or higher and have SS-7 functionality activated. LNP feature software activation is price at $4.00 per equipped line. This would include any local line packs, remotes or DLC interfaces (GR-303/TR-08) locations that are shown in the switch as equipped lines. Also LNP translation can be difficult so I recommend that you also engage Nortel to help support the translation requirements. The service charge for this runs about $3,000 per office. (HSO,SSO or SA) If you have any questions please give me a call. Thanks Jim Trier Nortel Sales 847-706-6156
4d.	Switch Translations - Nortel Systems		2	$	3,000	$	6,000	
4d.	Switch Translation - Engineering		2	$	3,000	$	6,000	
5.	Hardware & Other (Please list items below)							
5a.	LNP Hardware							
5b.	Transport Hardware - yr1							
5c.	Transport Hardware - yr2-5							
5d.								
	EXPENSES							
6.	Please list items below							
6a.	Regulatory/Legal/Admin/Cust Svc	yr1	100.00	$	200	$	20,000	Projected 150 hours of regulatory/legal at a composite average billing rate of $150/hour.
	yr1		115	$	15.00	$	1,728	These cost reflect the fixed NPAC database updates. It is projected that 6% of the lines will be ported in the first year requests at $15.00 per request.
	yr2		19	$	15.00	$	288	(same as above)
	yr3		19	$	15.00	$	288	(same as above)
	yr4		19	$	15.00	$	288	(same as above)
	yr5		19	$	15.00	$	288	(same as above)
6b.	Employee Education	Tech	2.00	$	8,965	$	17,930	NT Training class DMS-10 club
		Others	10.00	$	300	$	3,000	Estimated training cost for non-technical employees.
6c.	Technical Support/Processing/Trouble	tech	160.00	$	50	$	8,000	Estimated Technical labor hours for trouble, and support of LNP. Again very conservative, many times trouble shooting of network issues can take in excess of 40 hours per case.
6d.	Customer Education		1,920.00	$	0.75	$	1,440	CTC based on previous pre-prepared mail pieces estimated the cost of $.75 per customer per mailing. We projected that we would run two notices per year.
	TOTAL							

AT&T Wireless

November 21, 2003

Scott Rubins
Cambridge
111 East First Street
Geneseo, IL 61254

Dear Scott Rubins,

AT&T Wireless Services, Inc. is requesting provisioning of portability with your company for end users outside the Top 100 MSAs by May 24th, 2004 in accordance with the FCC's Wireless Number Portability Orders.

Enclosed is a Bona Fide Request form with a list of markets *outside the Top 100 MSAs* in which AT&T Wireless Services, Inc. is requesting portability by May 24th, 2004. Please indicate on the form whether each of your switches in the markets on this list in which you operate is LNP capable. If a switch is not currently LNP-capable, pursuant to the FCC's rules and requirements and this Bona Fide Request, you must ensure that your switches in the markets on this list are LNP capable by May 24, 2004.

We request that you complete the attached form and return to the undersigned by December 4th, 2003.

Please do not hesitate to contact me if you have any questions.

Sincerely,

Suzy Nieman

Manager, Carrier Relations
Phone: (425) 580 0845
Fax: (425) 580 8609
Suzanne.nieman@attws.com

U.S. Cellular

November 20, 2003

CAMBRIDGE TELEPHONE CO.
SCOTT RUBINS
111 EAST FIRST STREET
GENESEO, IL 61254

Enclosed is the Bona Fide Request (BFR) form in acceptance with the provisions of the FCC mandate to provide long-term deployment of Local Number Portability. The purpose of this letter is to request provisioning of LNP in areas where CAMBRIDGE TELEPHONE CO. is licensed to do business.

The attached BFR identifies the area by cellular/PCS market name that must be opened for porting by May 24, 2004. Please review this form, validate that CAMBRIDGE TELEPHONE CO. is responsible for the identified market and confirm the date by which these switches will be LNP capable. Please confirm receipt of this request within 10 days.

If you have any additional questions or concerns, you can contact me at the number below or at lpaarfusser@uscellular.com.

Sincerely,

Lisa Paarfusser
Manager-Interconnect
(773) 399-4985 – Desk
(773) 399-4123 – Fax

8410 West Bryn Mawr Avenue
Chicago, IL 60631-3486
Tel: 773 399 8900 Fax: 773 399 8936
www.uscellular.com

Interconnection/Numbering/Mandates

verizonwireless

Verizon Wireless
2785 Mitchell Drive MS 7-1
Walnut Creek, CA 94598

January 21, 2004

Cambridge Telephone Company
111 East First Street
Geneseo, IL 61254

Attn: Wilbur Floming

Consistent with the rules of the Federal Communications Commission ("FCC"), on November 24, 2003, Verizon Wireless will begin competitive porting by offering customers local number portability ("LNP").[1] The FCC sought to simplify the task of identifying the switches in each MSA in which number portability is deployed to facilitate competitive entry.[2] Thus, the FCC's rules require local exchange carriers to make available, upon request by any interested party, a list of their switches for which provisioning of number portability has been requested (and therefore provided) and a list of their switches for which provisioning of number portability has not been requested.[3]

Verizon Wireless has reviewed our commonly licensed areas and has found the following switches and NPA-NXXs not LNP capable. Upon receipt and verification of the attached Bonafide Request, Verizon Wireless requests that all of these commonly licensed areas, NPA-NXX and switch CLLIs are provisioned for LNP service. The timeframes for conversion to LNP of any additional switches are governed by the FCC's rules and range from 30 days to 180 days, depending upon the status of the switches.

To facilitate this request, please review and list any additional switches and NPA-NXXs serving those rate centers listed on the attached form that are not LNP capable and by what date these will be LNP capable. In addition, for those switches that are not LNP capable, please indicate the status of the switch using the categories developed by the FCC in its rules (*i.e.*, equipped remote, hardware capable, capable switches requiring hardware, and non-capable).[4] Please review and correct, if necessary the carrier name listed on the Bonafide Request. We request that you acknowledge receipt of this Bonafied Request and arrange to complete and return the attached form to the undersigned contact for Verizon Wireless within 10 days. Please call the undersigned with any questions or concerns.

Linda Godfrey
Verizon Wireless
Interconnection, Numbering and Mandates
925-279-6570

Enclosures

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1 *See* 47 C.F.R. § 52.31.

2 Local Number Portability, *First Memorandum Opinion and order on Reconsideration*, 12 FCC Rcd. 7236, ¶¶59-66 (1997).

3 *Id.* at ¶64; 47 C.F.R. § 52.23(b)(2)(iii).

4 47 C.F.R. § 52.23 (b)(2)(iv)(A-D).

Scott R. Freiermuth
Attorney
Law & Regulatory Affairs

Sprint PCS
6450 Sprint Parkway
Overland Park, KS 66251
KSOPHN0212
Voice 913 315 8521
sfreie02@sprintspectrum.com

February 23, 2004

Dear Sir or Madam:

The purpose of this letter is to request cooperation from your Company to complete a "Trading Partner Profile" so that our two companies may begin to port telephone numbers in accordance with federal law and Federal Communications Commission (FCC) rules and orders. Failure to provide this basic contact and connectivity information will prevent porting between our two companies, and Sprint PCS is prepared to notify the FCC of continued recalcitrance.

Sprint PCS recognizes that many wireline carriers had questioned their obligation to support LEC-wireless porting. The FCC in its November 10, 2003 LNP Order addressing LEC-wireless porting resolved this uncertainty when it unequivocally confirmed the wireline obligation to port numbers to/from wireless carriers.[1] Specifically, the FCC determined that wireline carriers operating within the largest 100 MSAs must support LNP on November 24, 2003 and that wireline carriers operating in areas outside the largest 100 MSAs must support LNP until May 24, 2004.[2]

The FCC has also confirmed that the information Sprint seeks is reasonable and must be provided, with the FCC explicitly stating that "Sprint's profile information exchange process is an example of the type of contact and technical information that would trigger an obligation to port."[3] Additionally, as you are aware, Sprint PCS submitted its BFR to your Company more than six months in advance of the November 24, 2003 start date, and followed-up its BFRs with requests for completion of a Trading Partner Profile in the July/August timeframe.

As such, to the extent your Company operates in areas within the top 100 MSAs, Sprint PCS requests *immediate* submission of your Company's "Trading Partner Profile." If your Company operates in areas wholly outside of the top 100 MSAs, Sprint PCS

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[1] *See, In the Matter of Telephone Number Portability,* Memorandum Opinion and Order and Further Notice of Proposed Rulemaking, CC Docket No. 95-116, FCC 03-284 (rel. Nov. 10, 2003).

[2] On January 16, 2004, however, the FCC granted a limited extension of LNP for certain covered "Two Percent Carriers" that operate in the top 100 MSAs until May 24, 2004. *See, In the Matter of Telephone Number Portability,* Order, CC Docket No. 95-116, FCC 04-12 (rel. Jan. 16, 2003).

[3] *Id.* at n.90

requests submission of the "Trading Partner Profile" by March 26, 2004. Attached hereto, Sprint PCS has provided an updated version of its Trading Partner Profile information.

To assist carriers in establishing a porting relationship, Sprint PCS has created a web site, http://www.sprintpcs.com/carrierwlnp/, containing electronic versions of the "Trading Partner Profile," Sprint PCS' Operational Agreement, and carrier FAQs. Sprint PCS encourages your Company to use this web site and enter and submit your Trading Partner Profile information electronically. Again, your Company and Sprint must have this basic "Trading Partner Profile" information in order to begin porting. Furthermore, Sprint PCS strongly encourages your Company to enter into an Operational Agreement and to arrange LNP testing with Sprint PCS.

Finally, Sprint wishes to remind its trading partners of their N-1 responsibilities. As you are likely aware, the FCC adopted NANC's recommendation that the N-1 carrier (the carrier in the call routing process immediately preceding the terminating carrier) be responsible for ensuring that databases are queried as necessary to effectuate portability. The N-1 carrier can meet this obligation by either querying the number portability database itself or by arranging with another entity to perform the database queries on behalf of the N-1 carrier. The FCC noted further that if the N-1 carrier does not perform the query, but rather relies on some other entity to perform the query, that other entity may charge the N-1 carrier.[4]

Sprint submits that it is time for all carriers to consider the welfare of their customers and to begin sharing the information needed to implement the new opportunities that will be soon presented to them. We would hope that you agree that establishing the foundation to support seamless porting is in the best interests of all of our customers.

If you have any questions or concerns, please contact Anne Mardick at 913-762-7398 or e-mail us at: SPCSWNPPartners@sprintspectrum.com.

Sincerely,

Scott R. Freiermuth, Esq.

Attachment

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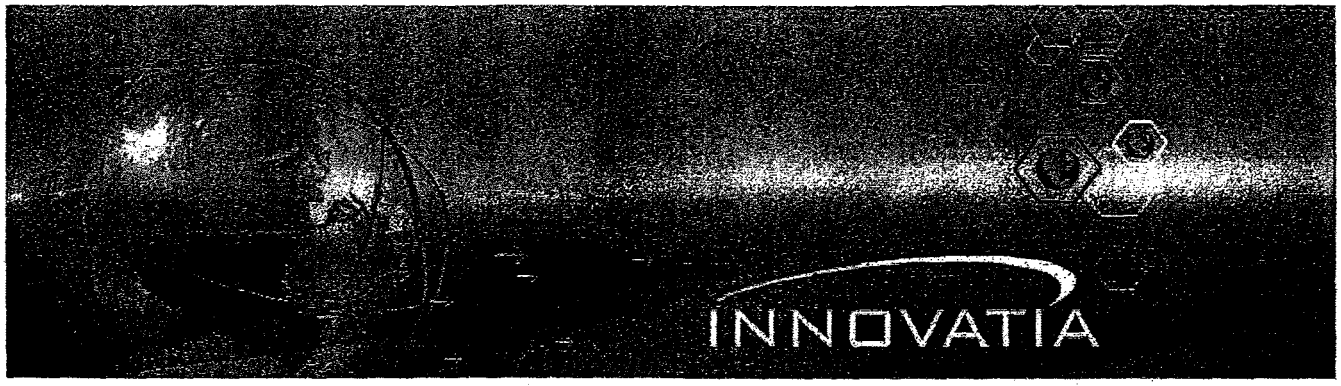
[4] *See, In the Matter of Telephone Number Portability*, Second Report and Order at paras. 73-75 (rel. August 18, 1997).

Attachment 3

Nortel Training Courses



Instructor-led Hands-on

Nortel Networks DMS SuperNode Family of Products

Course 7242
DMS SuperNode Local Number Portability (LNP) Translations and Operations
Price: USD - $1425
Length: 3 Days (18 Hours)

Course Description

Course 7242 provides instruction with extensive hands-on exercises, which prepare the student to implement and support Local Number Portability in a DMS SuperNode SSP switch. This course covers data table interaction and datafill process for the LNP-SSP. In-exercises include LNP setup and troubleshooting tools. The course also includes Operational Measurements, logs, and AMA billing changes required for LNP implementation.

Mode of Delivery

Course 7242 is delivered in 18 hours of instructor-led hands-on training.

Intended Audience

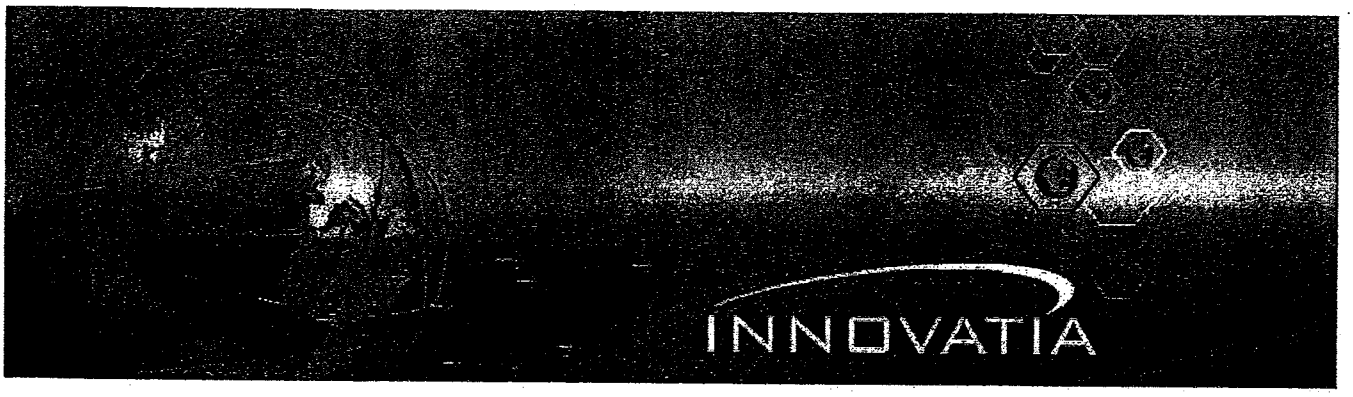
Anyone with SS7 translations experience who needs to know the specifics of Local Number Portability translations, operations, and troubleshooting.

Objectives

Upon completion of this course, you will be able to:

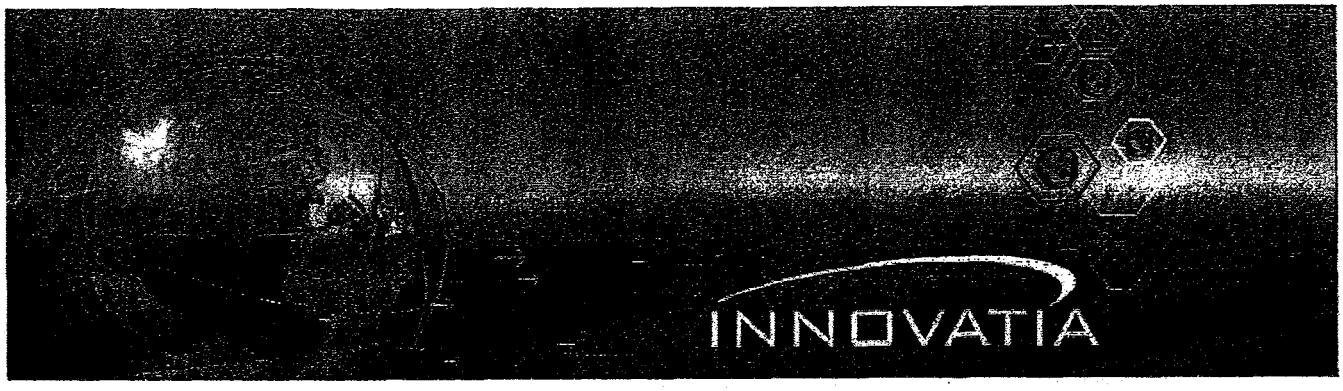
- Explain why Local Number Portability was developed and how it impacts the key industry service providers
- Explain how LNP fundamentally changes the signalling and routing of local calls
- Identify special translations and engineering provisions necessary to implement LNP in a DMS SuperNode SSP
- Use available DMS SuperNode tools for testing LNP translations and database queries and responses

NORTEL NETWORKS™ Premier Education Partner



Prerequisites

3403 DMS SuperNode Common Channel Signaling 7 Translations
6000 Introduction to Advanced Intelligent Network (AIN) for SSP
7232 DMS SuperNode Advanced Intelligent Network (AIN) SSP Translations & Operations



Instructor-led Hands-on

Nortel Networks DMS SuperNode Family of Products

Course 7232
DMS SuperNode Advanced Intelligent Network (AIN) SSP Translations & Operations
Price: USD - $1840
Length: 4 Days (24 Hours)

Course Description

Course 7232 provides instruction and hands-on exercises on the data table interaction and datafill process for the AIN SSP using Operational Measurements (OMs) and logs to identify traffic-related problems.

Mode of Delivery

Course 7232 is delivered in 24 hours of instructor-led hands-on training.

Intended Audience

Anyone responsible for DMS-100 AIM translations and operations

Objectives

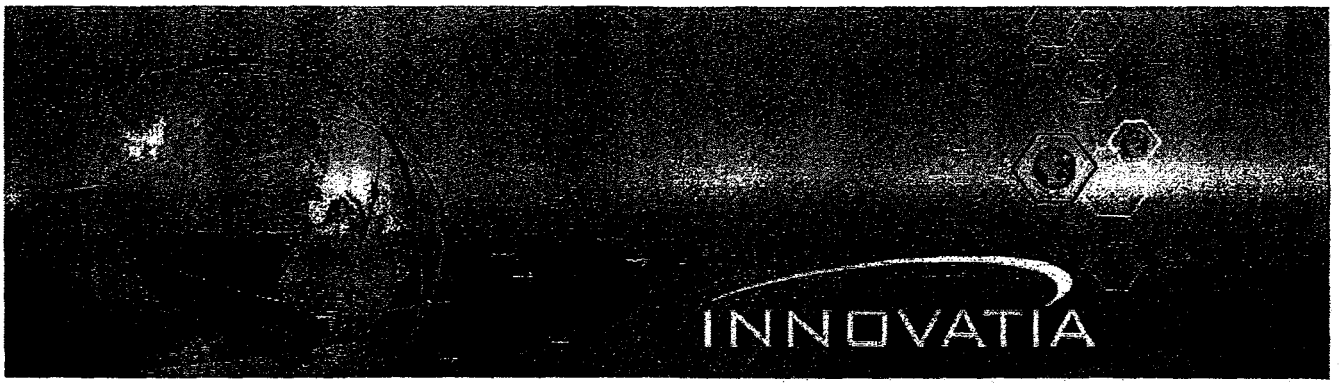
Upon completion of this course, you will be able to:

- Identify general office translation tables classified as treatment, AMA office parameters, message routing, subscription, call routing, and pre-translator as they pertain to AIN
- Describe and datafill AIN trigger types and trigger responses
- Trace AIN call progression through the data tables
- Use available software tools to troubleshoot translations and message routing
- Identify and use the Nortel Networks Technical Publications (NTPs) to datafill trigger tables
- Show how the Table Editor and SERVORD commands are used to manipulate AIN datafill
- Use TRAVER to examine the translation data output of AIN triggers
- Identify and use NTPs to interpret logs and OMs

Prerequisites

3403 DMS SuperNode Common Channel Signaling 7 Translations
6000 Introduction to Advanced Intelligent Network (AIN) for SSP

NORTEL NETWORKS™ Premier Education Partner



Instructor-led Hands-on

Nortel Networks DMS-10 Family of Products

Course 0285
DMS-10 AIN & LNP Translations
Price: USD - $1800
Length: 4 Days (24 Hours)

Course Description

Course 0285 provides instruction on how to implement translations for Advanced Intelligent Network (AIN) and Local Number Portability (LNP) to the DMS-10 Switch.

Mode of Delivery

Course 0285 is delivered in 24 hours of instructor-led hands-on training.

Intended Audience

This course is intended for translations personnel, database administrators, maintenance personnel, engineers, and planners.

Objectives

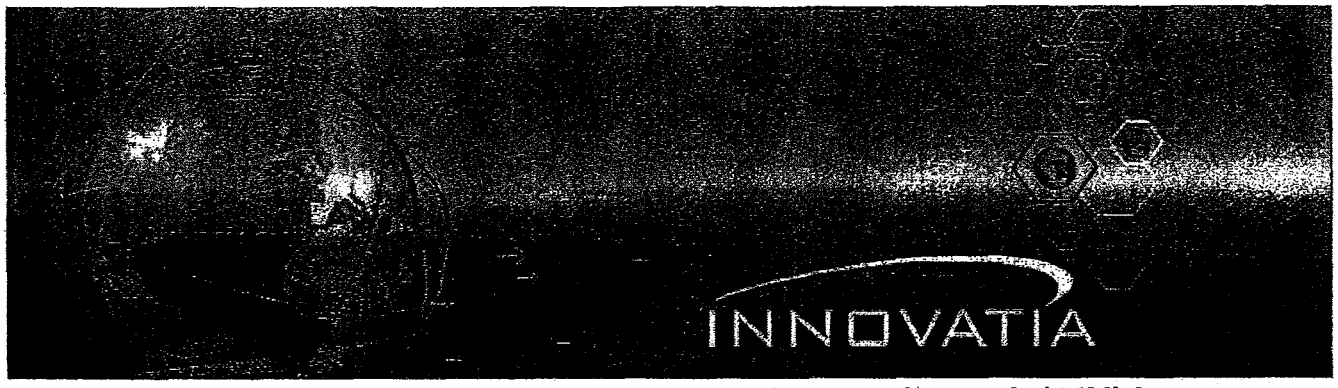
Upon completion of this course you will be able to:

- Configure the basic DMS-10 System for AIN and LNP
- Configure service logic host routes and associated administrative state codes
- Verify the CCS7 network is communicating to the proper Service Control Point (SCP)
- Configure the DMS-10 System to interface with recorded announcement equipment
- Configure the Service Switching Point (SSP) to process AIN and LNP response messages
- Assign AIN and LNP triggers

Prerequisites:

0211 DMS-10 System Translations
0235 DMS-10 Common Channel Signaling 7 (CCS7) OA&M and CLASS Translations
or equivalent experience

NORTEL NETWORKS™ Premier Education Partner



Module 1 – Implementation of Advanced Intelligent Network (AIN) in the DMS-10 Switch

Lesson 1 – AIN Functionality in the DMS-10 Switch

- AIN Functions Supported by the DMS-10 Switch

Lesson 2 – CCS7 Links for AIN Communications

- AIN System Configuration
- Service Logic Host Routes
- Communication With The SCP

Lesson 3 – AIN Announcements

- Vendor Digital Recorded Announcement (VDRA) Unit
- Trunk Configuration for Playing AIN Announcements
- Trunk Configuration for Recording AIN Announcements

Lesson 4 – AIN Response Messages

- SCP Response Messages
- SCP Configuration for Processing AIN Response Messages

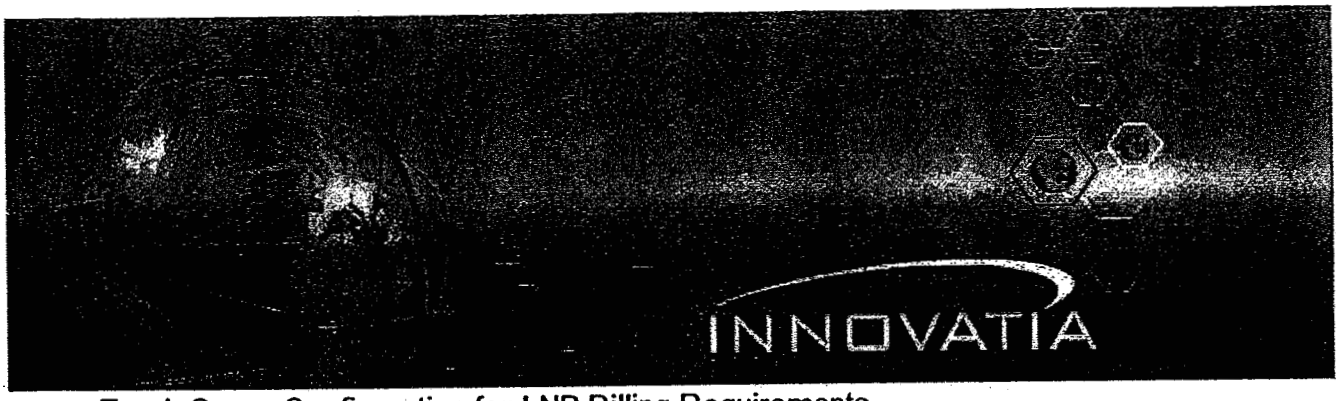
Module 2 – AIN Triggers

Lesson 1 – Station-Based Triggers

- Off-Hook Delay (OHD) Trigger
- Feature Code (FCD) Trigger
- Termination Attempt (TA) Trigger

Lesson 2 – Office Based Triggers

- LNP Service
- Location Routing Numbers (LRNs)
- LNP Network Components
- Basic Network Activities for Porting a DN
- Basic LNP Call Flow
- Signaling Parameters
- Error Conditions
- Basic System Configuration for LNP
- Service Logic Host Routes and Administrative State Codes
- Verify Communication with the SCP
- Configure the DMS-10 Switch for Ported DNs
- Configure LNP Associated Data



- Trunk Group Configuration for LNP Billing Requirements

Lesson 3 – Group-Based Triggers

- Customized Dialing Plan (CDP) Trigger
- Shared Interoffice Trunk (SIT) Trigger

This course can be purchased using Training Bank credits